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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) APPLICATION FOR AUTHORITY TO
) EMPLOY RESTRUCTURING CONSULTANT
Debtor-in-Possession.) - Embark Aviation Corp.

Pursuant to 11 U.S.C. §§ 327, and Bankruptcy Rule 2014, SeaPort Airlines, Inc., ("Debtor"), makes application to the Court for authority to employ Embark Aviation Corp., 745 Atlantic Ave., Boston, MA 02111, telephone: 727-743-4387, (the "Professional") as the estate's business restructuring consultant. The scope of the Professional's engagement is set forth more fully in the "Proposal" for Seaport Airlines dated April, 2016, a copy of which is attached to this application as **Exhibit A**, but will include services typical of a restructuring expert including but not limited to developing a business plan for Seaport Airlines demonstrating long-term viability, a financial plan, marketing strategy, network plan and competitive analysis, all of which is set forth in more detail in **Exhibit A**. In support of this application, Debtor represents:

1. On February 5, 2016 (the "Petition Date"), Debtor filed a petition under Chapter 11 of the United States Bankruptcy Code.

Page 1 of 3 - APPLICATION FOR AUTHORITY TO EMPLOY RESTRUCTURING CONSULTANT - Embark Aviation Corp. (Ben Munson)

VANDEN BOS & CHAPMAN, LLP
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2. Debtor requires the assistance of Professional to provide Debtor advice and assistance on the matters on which the Professional is to be engaged as set forth in **Exhibit A**. Such assistance will be invaluable to the Debtor with respect to preparing, confirming and implementing a Plan of Reorganization.

3. Debtor wishes to employ the Professional as the estate's Business Restructuring Consultant in this proceeding.

4. Debtor selected the Professional for the reason that Professional has extensive experience in business operations and procedures within the airline industry.

5. To the best of Debtor's knowledge, the Professional has no connection with the creditors or any other adverse party or its attorneys, except as disclosed in the Rule 2014 Verified Statement on file herein.

6. To the best of Debtor's knowledge the Professional represents no interest adverse to Debtor or the estate, except as disclosed in the Rule 2014 Verified Statement on file herein.

7. The proposed rate of compensation, subject to final court approval, is set forth in **Exhibit A** (the Proposal). The Professional's personnel performing services will be billed at a weighted rate of \$175 per hour, with total billings not to exceed \$30,000 without further Court order. The engagement includes 3 days of travel at zero Professional expense. Travel requested beyond three days (which is not anticipated) would be charged at \$800 per day, plus a per diem of \$45 per day, plus reimbursement of actual transportation expenses. The Professional requests payment on a monthly basis. A separate motion will be filed seeking the authority to pay the Professional on a monthly basis in reliance on the Knudsen factors.

8. The curricula vitae of those persons at Professional's company expected to perform services under the Proposal are included within the Proposal (**Exhibit A**).

WHEREFORE, Debtor prays that Debtor be authorized to employ and appoint Professional as a consultant to Debtor-in-Possession in this proceeding under Chapter 11 of the Bankruptcy Code.

Debtor also requests approval of the terms and conditions of the Professional's engagement as set forth in **Exhibit A** attached.

DATED: April 19, 2016

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/ Robert J Vanden Bos

Robert J Vanden Bos, OSB #78100

Douglas R. Ricks, OSB #044026

Christopher N. Coyle, OSB #07350

Of Attorneys for Debtor-in-Possession



Embark⁺

Cleared for Takeoff

Proposal Prepared For:
SeaPort Airlines, Inc.
April 2016

Nature of Engagement:
Business Planning

Ben Munson
Managing Partner
(727) 743-4387
Ben.Munson@embarkaviation.com



Mr. Tim Sieber,

Thank you for your interest in engaging Embark Aviation to act in an advisory role for SeaPort Airlines. I appreciate the time you spent discussing the opportunities of each airline during my site visit to Portland on March 31, 2016. As discussed, I'm confident our firm's expertise, personnel, and tools will allow us to be an effective resource and provide value to the airline.

Based on our discussion, I believe Embark Aviation can provide support to the leadership team of SeaPort Airlines, immediately through the development of a business plan for SeaPort, which can be leveraged for internal and external purposes, as well as longer term commercial planning support for the company both commercially and operationally. For your evaluation, I have provided the following proposal:

Business Plan Development for SeaPort Airlines

- *Demonstrate long term viability of SeaPort*
- *Brand and network strategy*
- *Financial plan*

Thank you again for your consideration of this proposal. I hope that this engagement provides a platform for a long-term relationship between our companies.

Best Regards,

Ben Munson

SeaPort Business Plan Development

Engagement Objective

Embark Aviation, an aviation support firm headquartered in Boston, Massachusetts, will develop an economically viable business plan for SeaPort Airlines of Portland, Oregon. The final product will be a plan that can be effectively utilized by SeaPort Airlines to exit bankruptcy, secure investment, or for general business planning purposes.

Project Deliverables

The business plan developed for SeaPort Airlines will clearly demonstrate the economic viability of the company going forward independently. Specific deliverables incorporated into the business plan are expected to include:

Financial Plan

- 36 month pro-forma and cash flow forecasts
- Highlight relevant unit cost metrics, including cost metrics by driver
- Identify and value opportunities for cost reduction (both realized and expected)
- Revenue forecast, to include by-market revenue detail
- Clearly identify assumptions to highlight reasonableness of plan

Marketing Strategy

- Identify company brand strategy
- Distribution platform
- Alliance plan
 - Interline
 - Codeshare
 - Marketing/FFP Agreements

Network Plan

- Overview of Network Strategy
- Monthly detailed capacity plan, including by market frequency levels for 36 months
- Detailed operating statistics for 36 months

Competitive Analysis

- Summary and analysis of relevant competitors (to include current & potential)
- SeaPort Airlines SWOT Analysis

A summary of the business plan will be produced in both a document (word file) and presentation (power-point file) for consumption purposes.

Executive Sponsor of Project

Ben Munson will act as the executive sponsor of the engagement, and will leverage Embark Aviation resources as most appropriate to support deliverables required. Resumes of several relevant members of the Embark Aviation team are included as part of this proposal.

Ben Munson

Qualifications: Ben Munson has over 10 years of experience at several US airlines with experience in various commercial planning functions. Through his experience at both AirTran Airways and Alaska Airlines, Ben has become well versed in capacity planning, alliances, financial planning & analysis, and revenue management. He has consulting experience with regional and major airlines in both revenue management and capacity planning capacities.

Responsibilities: As executive sponsor and project manager, Ben Munson will hold responsibility for all final deliverables provided to SeaPort Airlines and be tasked with regular communication with SeaPort Airlines. Ben will manage other resources dedicated to this engagement, including any analyst(s) or partner(s) assigned. Ben is based in Boston, Massachusetts.

Timeline / Project Duration

The project start date for this engagement is April 18, 2016. The targeted completion date for the project is May 27, 2016. Embark Aviation will provide continued support on the business plan as required by SeaPort Airlines through December 31, 2016.

Communication Plan / SeaPort Contact

It is the working assumption of Embark Aviation that the SeaPort Airlines representative responsible for this engagement will be Tim Sieber, President of SeaPort Airlines. Embark Aviation will work directly with other personnel at SeaPort Airlines as required to successfully achieve the objective of the engagement.

Embark Aviation will make all reasonable business efforts to provide the most effective communication with SeaPort as part of this engagement. Subject to the approval of SeaPort Airlines leadership, Embark proposes:

- Scheduled weekly status call and report-out
- VPN access to SeaPort Quickbooks for Ben Munson, executive sponsor of engagement
- Distribution of Ben Munson personal contact information to Tim Sieber

Embark Aviation Proposal Document

Work Location

Embark Aviation anticipates that the majority of the work and communication related to this engagement will occur off-site from SeaPort Airlines offices. Embark Aviation will make reasonable commercial efforts to be available for travel and work on-site to SeaPort Airlines as deemed beneficial to the engagement.

Travel

Embark Aviation can commit personnel for travel up to three (3) days at zero professional expense (excluding travel-related expenses) as part of this engagement. Beyond that, Embark Aviation will charge a rate of \$800 per day.

All travel related expenses incurred as part of this engagement by Embark Aviation will be reimbursed in full to Embark Aviation. This will include a per diem rate of \$45 per day, accommodation, airfare, taxi, and other transportation expenses. Travel expenses will not exceed \$1,500 without further order of the Bankruptcy Court.

Compensation

It is anticipated that Embark personnel will incur 172 working hours associated with this assignment. Personnel associated with this project have a weighted billing rate of \$175. Therefore, the total services charged shall not exceed the sum of \$30,000 without further order of the Bankruptcy Court.

Payment Schedule

SeaPort will file a request with the Bankruptcy Court to for payment of Embark's fees on a monthly basis. Embark reserves the right to decline the assignment if SeaPort is unable to obtain Court approval to make payment of all or a reasonable percentage of Embark's fees on a monthly basis.

Ben Munson

-
- 2125 14th St. NW Apartment 202W Washington D.C. 20009 • (727) 743-4387
 - Ben.Munson@embarkaviation.com
-

Airline Commercial Planning Expert

Highly driven leader with expertise in airline commercial planning, including capacity, schedule, and fleet planning, revenue management, and alliances. Portfolio of experience at highly profitable carriers with a well-versed background in all commercial aspects of the airline business. Motivated strategic thinker providing clients with actionable strategy for business development and commercial planning.

Areas of Expertise

- Network / Capacity Planning
 - Schedule Planning
 - Ancillary Strategy/ Analysis
 - Competitive Analysis
 - Revenue Management
 - Leadership / Team Building
 - Financial Planning
 - Network Profit Reporting
 - Fleet Planning
 - M&A Analysis
 - Codeshare/ Alliance Reviews
 - Airport / Slot Negotiation
-

Professional Experience

EMBARK Aviation, Boston, MA

Managing Partner

2014 - Current

Leader in the Embark Aviation organization with focus on airline commercial planning for regional and niche regional airlines. Managed engagements for regional, national, and major carriers world-wide in the areas of revenue management, alliances, and capacity planning.

- Evaluation of network modeling practices for various carriers. Oversee implementation of new processes to improve network profitability
- Development of new revenue management processes and work-flow for several carriers experiencing organizational change
- Lead negotiation of interline and codeshare agreements for both major and regional carriers
- Manage air service initiatives world-wide, including oversight of co-ordination between airports, communities, and airlines

ALASKA AIRLINES, Seattle, WA

Director, Capacity Planning

2012 - 2014

Full responsibility of company's network development and capacity management- portfolio of over 170 aircraft generating in excess of \$4 billion in annual revenue. Internal representative to executive team on network, schedule, and fleet planning and external representative of company to airports/communities on air service development issues.

- Initiated over 50 new markets for the company while maintaining system ROIC performance and improving absolute profitability
- Reduced portfolio of unprofitable flying by 80% through capacity changes and/or co-ordination cross-divisionally
- Spearheaded review of new LOPA configuration. Decision by Board of Director to implement on over 60% of fleet and expected to generate \$50m in annual revenue

Embark Aviation Proposal Document

- Create and deliver monthly presentations to company executive leadership to review network performance, competitive changes, and opportunities
- Work in co-ordination with pricing department to institute new strategy for various ancillary revenue streams improving revenues by approximately \$35 million per year

ALASKA AIRLINES, Seattle, WA

Manager, Network Planning

2010 - 2012

Lead team of analysts while reporting directly to the executive Vice President of Planning. Full oversight of department during period of increasing responsibility including management of all aspects of route profitability reporting and long-term fleet planning.

- Built team of network planning analysts and managed work flow and prioritization
- Rebuilt schedule development methodology to be more granular including day-of-week adjustments and seasonal phasings. System benefit of initiatives estimated between \$100 and \$115m annually for the system
- Established new process for review of codeshare and alliance network to better optimize traffic

ALASKA AIRLINES, Seattle, WA

Senior Analyst, Network Planning

2009 - 2010

Forecast and propose route and frequency adjustments, new markets, and schedule changes. In addition, act in advisory and leadership role to junior analysts on the network planning team.

- Developed standardized methodology and tool for route forecasting which substantially improved the accuracy of forecasts for both new markets and capacity changes
- Adjusted schedule development process to better incorporate flight operations for a more crew-efficient schedule. Ultimately resulted in annual cost reduction of \$10 million
- Developed tool to monitor competitive carrier networks and estimate by-market route profitability

AirTran Airways, Orlando, FL

Analyst, Strategic Planning

2005 - 2009

Responsible for forecasting all network changes including new markets, changes in frequency or aircraft type, and the impact of material time changes. In addition, assume a schedule planning role to ensure optimal connectivity across carrier hubs.

- Conducted all network forecasting leading to company growth of 25% and record system profitability.
- Instituted new process for tracking potential route opportunities.

Education

UNIVERSITY of CENTRAL FLORIDA, Orlando, FL

Bachelor of Science, Major in Finance

- Member of Burnett Honors College
- Graduated Magna Cum Laude

Jamie Kogutek

jamiek@embarkaviation.com

321-331-7960

Energetic and innovative airline executive with unique ability to translate financial goals into operational requirements in a dynamic environment. Specialties include: network optimization, capacity planning, alliance and partnership management, airline and airport regulation, and air service development within a diverse set of experiences with traditional, low cost, and regional airlines.

Experience

Vice President, Capacity Planning, Embark Aviation

August 2015 – present

- Lead efforts on Capacity Planning projects on behalf of airline clients
 - Network Development, Scheduling, and Distribution expert
 - Development and technical implementation of interline and code share relationships

Vice President, Network & Schedule Planning, Silver Airways

August 2013 – July 2015

- Redesigned Silver's flight network to focus on efficiencies and commercially viable markets
 - Increased domestic at-risk revenue by 24%
 - Refocused Essential Air Service network to viable partner supported networks
 - Led company airline partner relationships and development efforts
 - Increased partner-sourced revenue over \$10mil
 - Recruited three interline ticketing agreements
 - Negotiated and implemented JetBlue interline ticketing and code share agreements
 - Oversight of transition from United Express to United code share partner
 - Led structural cost reductions initiatives
 - Elimination of distant and non-productive route networks
 - Oversight of transition to single, more efficient aircraft fleet
 - Lead planning efforts to relocate maintenance bases
 - Redesigned flight schedule to eliminate excess crew cost
 - Created and maintained company's budget schedule and financial performance statistics
 - Created and implemented updated Market Profitability model, Flow Traffic Report to understand Origin and Destination traffic patterns, and EAS monitoring tool, to ensure compliance with federal regulations

Air Service Strategy and Development Consultant, Sixel Consulting Group

May 2011 - July 2013

- Assisted airport clients in translating community air service goals into viable business cases for airlines, utilizing
 - Extensive data analysis
 - Leakage studies
 - Airport cost studies
 - Airline incentive analysis
 - Grant writing and application
 - Airline headquarters and conference meetings
 - Recruited five new clients, including several high profile airports
 - Assisted eight client airports win fifteen new routes

Embark Aviation Proposal Document

- Authored winning Small Community Air Service Development Grants

Senior Manager, Strategic Planning & Scheduling, AirTran Airways September 2005 - May 2011

- Led team of up to five in creating and managing flight schedule for \$2 billion airline
 - Managed flight schedule within operational constraints through growth from 98 to 140 aircraft
 - Created and maintained annual budget for ASM's, block hours, and other key metrics
 - Monitored and managed on-time and block time performance metrics
- Identified and evaluated market opportunities for growth and reduction
 - Reviewed and analyzed U.S. DOT data, advanced bookings, profitability, and competitive trends
 - Liaised with airport air service and marketing professionals in the development of new routes
- Managed company airport slot portfolio for services at Newark, New York (LaGuardia), Washington (Reagan-National), and Westchester County, NY
 - Identified opportunities for slot trades, acquisition, and leases, resulting in new revenue stream for company, improved network development opportunities, and new market growth
- Distributed schedule to multiple stakeholders
 - Worked with internal departments such as Stations, Crew Planning, and SOC for implementation
 - Distributed schedule to company reservations system (New Skies) and GDS via OAG/Innovata
- Led cross-functional meetings to ensure company was meeting performance goals
 - Operational meetings designed to ensure delivery of on-time flights to customers, within budget
 - Commercial meetings designed monitor revenue production and triage problems with cross-functional solutions

Senior Analyst, Schedule Planning, America West Airlines August 1999 – August 2005

- Primary scheduler for America West Express, Columbus (CMH) hub, and Sports Charter programs
 - Managed schedules for multiple regional flight providers
 - Monitored regional fleet delivery process, resulting in significant fleet changes
- Redesigned hub structures at Las Vegas (LAS) and Columbus (CMH)
 - Identified opportunities for improving traffic flows over multiple hubs

Customer Service Representative, CMH, America West Airlines June 1997 – August 1999

- Passenger processing at ticket counter and gates in a small hub environment

Education

BS Business Administration, March 1999, Max M. Fischer College of Business, Ohio State University

- Majors: Aviation Management; Transportation and Logistics
- Honors: Graduated Cum Laude; President of Pi Sigma Epsilon chapter

Software and Systems

- Scheduling Tools: Oasis (from Starline Systems); Air Flite (from Sabre)
- Reservations systems: New Skies and Open Skies (from Navitaire); Shares (from EDS); SabreSonic; VARS (from Videocom)
- Airline Data Miners: APG DAT/DIIO Mi (from DIIO / Seabury / Airline Planning Group); Data Base Products, Inc.; Planitas

Embark Aviation Proposal Document

Joshua R. Stone

(334) 707-8312

jrstone@gmail.com

28 Parker Street #2

Charlestown, MA 02129

Education: **Auburn University – Auburn, Alabama** December 2014

Bachelor of Science, Interdisciplinary Economics & Aviation Management

Experience: **Embark Aviation – Boston, Massachusetts** January 2016 – Present

Manager, Network Planning

- Network planning, capacity planning, scheduling, and alliance development solutions for regional and niche airlines

American Airlines Group – Fort Worth, Texas August 2014 – December 2015

Analyst, Domestic Network Planning

- Contributed to Increasing single-hub profit by 145% year-over-year
- Created regular and ad-hoc reports to summarize various situations and proposed action items
- Worked to determine new markets, market exits, and seasonal/day-of-week strategies
- Created models to pair historical profitability data and future schedules to surgically add and remove capacity on a day-of-week basis in each season.

Sixel Consulting Group – Eugene, Oregon June 2009 – October 2014

Research Associate

- Provided data and analysis to consultants in support of client air-service presentations
- Prepared presentations for and facilitated airport-airline meetings
- Maintained industry specific data and a current library of economic indicators
- Developed airport-level enplanement forecasting methodology
- Developed QSI-based route revenue forecasting methodology
- Developed route P&L approximation methodologies for all major US carriers

US Airways Group – Tempe, Arizona May 2013 – August 2013

Intern, Strategy & Long Range Planning

- Worked as a member of a team to determine financial impact of banking hubs
- Developed and calibrated QSI model for forecasting market size and shares
- Prepared materials to show impact of various variables on carrier schedule performance for immediate and senior management

Mobile Airport Authority – Mobile, Alabama June 2009 – August 2009

Intern, Marketing & Air Service Development

- Assisted Regional Airport's Marketing Manager with
 - Air Service Development including route opportunity analyses, statistical analyses, benchmarking to other regional airports
 - Public Relations including marketing strategy, media placements, press release and company newsletter preparation, and social media presences
 - Event Planning for community and airport authority events

Skills:

Exceptional affinity for large sets of data; fluent in Cognos, SAS, SQL, and Hyperion; expert skills in all Microsoft Office Applications to include Access, Excel, SharePoint, and Visual Basic; excellent working knowledge of airline route development process, airport incentive package preparation, and airline profitability components/systems; preparation of regular and ad-hoc reports and presentation preparations for all levels of management.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re _____
Debtor(s))
) Case No. _____
)
) RULE 2014 VERIFIED STATEMENT
) FOR PROPOSED PROFESSIONAL

Note: To file an amended version of this statement per ¶19, file a fully completed amended Rule 2014 statement on LBF #1114 and clearly identify any changes from the previous filed version.

1. The applicant is not a creditor of the debtor except:
2. The applicant is not an equity security holder of the debtor.
3. The applicant is not a relative of the individual debtor.
4. The applicant is not a relative of a general partner of the debtor (whether the debtor is an individual, corporation, or partnership).
5. The applicant is not a partnership in which the debtor (as an individual, corporation, or partnership) is a general partner.
6. The applicant is not a general partner of the debtor (whether debtor is an individual, corporation, or partnership).
7. The applicant is not a corporation of which the debtor is a director, officer, or person in control.
8. The applicant is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of the debtor.
9. The applicant is not a person in control of the debtor.
10. The applicant is not a relative of a director, officer or person in control of the debtor.
11. The applicant is not the managing agent of the debtor.
12. The applicant is not and was not an investment banker for any outstanding security of the debtor; has not been, within three years before the date of the filing of the petition, an investment banker for a security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor; and is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of such an investment banker.
13. The applicant has read 11 U.S.C. §101(14) and §327, and FRBP 2014(a); and the applicant's firm has no connections with the debtor(s), creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, or any District of Oregon Bankruptcy Judge, except as follows:

14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.
15. Describe details of all payments made to you by either the debtor or a third party for any services rendered on the debtor's behalf within a year prior to filing of this case:

16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:

17. The applicant is not an affiliate of the debtor.
18. Assuming any affiliate of the debtor is the debtor for purposes of statements 4-13, the statements continue to be true except (list all circumstances under which proposed counsel or counsel's law firm has represented any affiliate during the past 18 months; any position other than legal counsel which proposed counsel holds in either the affiliate, including corporate officer, director, or employee; and any amount owed by the affiliate to proposed counsel or its law firm at the time of filing, and amounts paid within 18 months before filing):

19. The applicant hereby acknowledges that he/she has a duty during the progress of the case to keep the court informed of any change in the statement of facts which appear in this verified statement. In the event that any such changes occur, the applicant immediately shall file with the court an amended verified statement on LBF #1114, with the caption reflecting that it is an amended Rule 2014 statement and any changes clearly identified.

THE FOLLOWING QUESTIONS NEED BE ANSWERED ONLY IF AFFILIATES HAVE BEEN LISTED IN STATEMENT 16.

20. List the name of any affiliate which has ever filed bankruptcy, the filing date, and court where filed:

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months:
 22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:
 23. List any security interest in any property granted by the debtor to secure any debts of any affiliate not covered in statements 20 and 21. List any security interest in any property granted by the affiliate to secure any debts of the debtor not covered in statements 21 and 22. Also include the collateral, the date and nature of the security interest, the name of the creditor to whom it was granted, and the current balance of the underlying debt:
 24. List the name of any affiliate who is potentially a "responsible party" for unpaid taxes of the debtor under 26 U.S.C. §6672:

I verify that the above statements are true to the extent of my present knowledge and belief.

Applicant

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11

CERTIFICATE - TRUE COPY

DATE: April 19, 2016

DOCUMENT: APPLICATION FOR AUTHORITY TO EMPLOY
RESTRUCTURING CONSULTANT Embark Aviation Corp. and
RULE 2014 VERIFIED STATEMENT FOR PROPOSED
PROFESSIONAL Embark Aviation Corp. (Ben Munson)

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc. Attn: Timothy Sieber 7505 NE Airport Way Portland, OR 97218	Franklin C. Adams POB 1028 Riverside, CA 92502-1028	Michael J. Edelman VEDDER PRICE 1633 Broadway, 47th Floor New York, New York 10019
Ben Munson EMBARK AVIATION CORP. 745 Atlantic Ave. Boston, MA 02111	Mark J. Wolfson 100 N Tampa St #2700 Tampa, FL 33602	Tulare County Tax Collector Attn Jorge Garcia Deputy Tax Collector 221 S Mooney Blvd Rm 104-E Visalia, CA 93291-4593

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the above date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: April 19, 2016

VANDEN BOS & CHAPMAN, LLP

By:/s/Robert J Vanden Bos

Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Of Attorneys for Debtor-in-Possession